

# **APPENDIX B**

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9 Attorneys for WAYMO LLC

10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA

12 SAN FRANCISCO DIVISION

13 WAYMO LLC,

14 Plaintiff,

15 vs.

16 UBER TECHNOLOGIES, INC.;  
17 OTTOMOTTO LLC; OTTO TRUCKING  
LLC,

18 Defendants.

CASE NO. 3:17-cv-00939

**PLAINTIFF WAYMO LLC'S FOURTH  
AMENDED RULE 26(a)(3) WITNESS  
LIST**

Plaintiff Waymo LLC (“Waymo”) hereby provides its fourth amended witness list pursuant to Fed. R. Civ. P., 26(a)(3) and paragraphs 1 and 2(a) of the Guidelines for Trial and Final Pre-Trial Conference in Civil Jury Cases Before the Honorable William Alsup.

Waymo identifies the name and, if not previously provided, the address, telephone number, and anticipated testimony of each witness it may present at trial other than solely for impeachment — separately identifying those the party expects to present and those it may call if the need arises. Waymo further reserves the right to call any witness on any of Defendants' witness lists, further including any of the witnesses identified by Defendants or Waymo on any subjects identified by either Defendants or Waymo.<sup>1</sup>

**I. WITNESSES WAYMO WILL PRESENT AT TRIAL**

Name	Contact Information	Substance of Testimony
Prabir Adarkar	May be reached through counsel for Uber	Mr. Adarkar may be asked to provide non-cumulative testimony regarding Uber’s financial forecasts for autonomous vehicles, and Uber’s competitive relationship with Waymo, including its willingness to cut prices to compete with Waymo.
Shawn Bananzadeh	May be reached through counsel for Waymo	Mr. Bananzadeh will provide non-cumulative testimony regarding costs of development of, and management of Waymo’s self-driving cars and autonomous vehicle technology. Waymo further identifies the subjects of the Rule 30(b)(6) topic(s) for which he was designated as Waymo's corporate witness.
John Bares	May be reached through counsel for Uber	Mr. Bares will be asked to provide non-cumulative testimony concerning Defendants misappropriation of Waymo’s trade secrets, including their acquisition, use and disclosure, and the lack of independent development; acquisition of Otto; and Mr.

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<sup>1</sup> Waymo's list includes witnesses who may be offered in rebuttal.

1			Levandowski's employment milestones.
2	Gary Brown	May be reached through counsel for Waymo	Mr. Brown will provide non-cumulative testimony concerning Google/Waymo's forensic investigation into misappropriation of trade secrets, particularly analysis of log data and hardware; Google/Waymo's reasonable efforts to maintain the secrecy of its electronic systems, digital document storage repositories, and computer networks, including but not limited to the SVN server. Waymo further identifies the subjects of the Rule 30(b)(6) topic(s) for which he was designated as Waymo's corporate witness.
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9	Scott Boehmke	May be reached through counsel for Uber	Mr. Boehmke will provide non- cumulative testimony concerning Defendants misappropriation of Waymo's trade secrets, including their acquisition, use and disclosure, and the lack of independent development.
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14	Dan Chu	May be reached through counsel for Waymo	Mr. Chu will provide non-cumulative testimony regarding matters that concern Waymo, including investment in, development of, and management of Waymo's self-driving cars and autonomous vehicle technology; the current and future nature of the relevant markets and competition in the relevant markets, and other issues related to irreparable harm and damages suffered by Waymo, Waymo's short-term and long-term business plans, Waymo's early rider program in Phoenix, Waymo's launch of its TaaS service, and Waymo's understanding of the TaaS market (including competition in that market and Waymo's competitive advantages). Waymo further identifies the subjects of the Rule 30(b)(6) topic(s) for which he was designated as Waymo's corporate witness.
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25	Andy Crain	May be reached through counsel for Waymo	Mr. Crain will provide expert testimony pertaining to forensic analysis of the devices the Diligenced Employees provided to Stroz Friedberg, including flaws in the Stroz due diligence process; devices not provided to Stroz; device connections and activity on Levandowski's MacBook computer; and
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1			browser history and download history on Levandowski's MacBook computer.
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3	Dmitri Dolgov	May be reached through counsel for Waymo	Dr. Dolgov will provide non-cumulative testimony regarding the development of Waymo's self-driving car technology, including its LIDAR designs and associated self-driving vehicle software development; the development of certain of Waymo's trade secrets, Waymo's engineering practices, and the Chauffeur Bonus Plan. Waymo further identifies the subjects of the Rule 30(b)(6) topic(s) for which he was designated as Waymo's corporate witness.
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10	Pierre-Yves Droz	May be reached through counsel for Waymo	Mr. Droz will provide non-cumulative testimony regarding the development of Waymo's self-driving car technology, including its LIDAR designs and the development of Waymo's trade secrets, time to develop Waymo's LIDAR designs and trade secrets, engineering practices of Waymo and the LIDAR team regarding the confidentiality of its designs and measures to keep them secret, the contents of Waymo's SVN server, and communications with Anthony Levandowski regarding Uber and formation of Otto. Waymo further identifies the subjects of Mr. Droz's prior declarations submitted in this matter, Dkt. 25-31, 453-3 as subject he may testify about as well as the Rule 30(b)(6) topics for which he was designated as Waymo's corporate witness.
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22	Eric Friedberg	May be reached through counsel for Stroz Friedberg:	Mr. Friedberg will be asked to provide non-cumulative testimony regarding the Stroz due diligence analysis, investigation, and report, and the Uber-Otto acquisition; Defendants' misappropriation of Waymo's trade secrets, including their acquisition, use and disclosure.
23		Melanie Blunschi	
24		Latham & Watkins	
25		505 Montgomery Street, Suite 2000	
26			
27		San Francisco, CA 94111-6538	
28			

1		Direct Dial: +1.415.395.8129	
2		Email:	
3		<a href="mailto:melanie.blunsch@lw.com">melanie.blunsch@lw.com</a>	
4	John Gardner	May be reached through counsel:	Mr. Gardner will be asked to provide non-cumulative testimony regarding Ottomotto and Otto Trucking; the Uber-
5		Merri Baldin	Otto acquisition; Mr. Levandowski's
6		Rogers Joseph O'Donnell	businesses; the Stroz due diligence
7		311 California Street, 10th fl	analysis, investigation, and report; the
8		San Francisco, CA 94104	misappropriation of Waymo trade
9		415.956.2828 main	secrets; destruction of relevant evidence;
		<a href="mailto:mbaldwin@rjo.com">mbaldwin@rjo.com</a>	and Tyto LiDAR.
10	William Grossman	May be reached through counsel for Waymo	Mr. Grossman will provide non-
11			cumulative testimony regarding
12			Waymo's accidental receipt of an email
			containing an Otto LiDAR PCB.
13	Dan Gruver	May be reached through counsel for Uber	Mr. Gruver will be asked to provide non-
14			cumulative testimony regarding
15			Defendants' misappropriation of
16			Waymo's trade secrets, including their
			acquisition, use and disclosure, and the
			lack of independent development; and the
			development of Waymo's self-driving car
			technology, including its LIDAR designs.
17	Mary Fulginiti	May be reached through counsel for Stroz Friedberg	Ms. Fulginiti will be asked to provide
18			non-cumulative testimony regarding the
19			Stroz due diligence analysis,
			investigation, and report.
20	Bill Gurley	May be reached through counsel:	Mr. Gurley will be asked to provide non-
21		Martin Flumenbaum	cumulative testimony regarding Uber's
22		1285 Avenue of the Americas	acquisition of Otto; board meetings,
23		New York, NY 10019	discussions, and knowledge concerning
24		(212) 373-3191	the Otto acquisition including Mr.
25		<a href="mailto:mflumenbaum@paulweiss.com">mflumenbaum@paulweiss.com</a>	Kalanick and others' representations;
26			facts surrounding Mr. Kalanick and board
27			discussions concerning his termination;
28			negotiations with Mr. Kalanick
			concerning the Otto acquisition and his
			resignation; Stroz due diligence report;
			and representations made by Mr.
			Kalanick regarding the Stroz report and
			Otto acquisition; and Benchmark's claim
			that Mr. Kalanick committed fraud and
			breached his fiduciary duty with respect

1			to the Otto acquisition.
2	James Haslim	May be reached through counsel for Uber	Mr. Haslim will be asked to provide non-cumulative testimony regarding Defendants misappropriation of Waymo's trade secrets (including but not limited to through Tyto LIDAR), including their acquisition, use and disclosure, and the lack of independent development.
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6	Mat Henley	May be contacted through counsel:	Mr. Henley will be asked to provide non-cumulative testimony regarding the allegations made by Richard Jacobs, including the use of ephemeral communications, non-attributable devices, and improper privilege designations to avoid discovery; Uber's investigation into the Jacobs allegations and settlement with Jacobs; and Uber's competitive intelligence efforts and practices
7		Jennifer LaGrange	
8		Matthew Umhofer	
9		Spertus, Landes & Umhofer, LLP	
10		1990 South Bundy Drive	
11		Suite 705	
12		Los Angeles, CA 90025	
13		310.826.4700	
14		jennifer@spertuslaw.com	
15		matthew@spertuslaw.com	
16	Lambertus Hesselink	May be reached through counsel for Waymo	Professor Hesselink will provide expert testimony pertaining to optics as it relates to a LiDAR system for a self-driving vehicle; general optics and LiDAR principles, background state of the art; explain Waymo's disclosed trade secrets relating to LiDAR optical systems and components and is expected to provide opinions regarding the level of skill and effort required to derive such trade secrets based on the available evidence in this case. Retained Prof. Hesselink is expected to also opine that Waymo's LiDAR systems embody certain of Waymo's disclosed trade secrets.
17			Prof. Hesselink is expected to further offer opinions that (i) Waymo undertook reasonable efforts to maintain certain disclosed trade secrets in relative secrecy; (ii) such trade secrets are not generally known by individuals within the relevant filed and/or are not readily ascertainable; and (iii) such trade secrets derive independent economic value by virtue of their not being generally known in the relevant field. Additionally, Prof. Hesselink is expected to opine regarding Defendants' misappropriation of certain of Waymo's disclosed trade secrets based on (i) contemporaneous technical
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1			evidence reflecting Defendants' acquisition, use, and/or disclosure of Waymo's disclosed trade secret concepts;
2			(ii) the similarity of Defendants' technology to Waymo's disclosed trade secrets and/or Waymo's implementation of such trade secrets in Waymo's commercial products; and/or (iii) the lack of evidence supporting Defendants' independent development of their own technology.
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7	Jeff Holden	May be reached through counsel for Uber	Mr. Holden will be asked to provide non-cumulative testimony regarding the state of Uber's autonomous vehicle program before the Otto acquisition; negotiations with Mr. Levandowski regarding the acquisition; Mr. Levandowski's consulting work; facts surrounding Mr. Levandowski's continued employment with Uber and termination; and Defendants' misappropriation of Waymo's trade secrets.
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13	Richard Jacobs	May be contacted through counsel:	Mr. Jacobs will be asked to provide non-cumulative testimony regarding the allegations he made and Uber's reactions thereto, including the use of ephemeral communications, non-attributable devices, and improper privilege designations to avoid discovery, and Uber's competitive intelligence efforts and practices; Jacobs' settlement with Uber, and consulting services provided to Uber.
14		Martha Boersch	
15		Boersch Shapiro LLP	
16		1611 Telegraph Avenue, Suite 806	
17		Oakland, California 94612-2147	
18		(415) 500-6640	
		mboersch@boerschshapiro.com	
19	Michael Janosko	May be reached through counsel for Waymo	Mr. Janosko will provide non-cumulative testimony regarding reasonable measures to protect security at Google and Waymo, including Google's enterprise infrastructure.
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22	Travis Kalanick	May be reached through counsel:	Mr. Kalanick will be asked to provide non-cumulative testimony regarding Uber's driverless car program; Uber's solicitation of Google and Waymo employees; discussions with, knowledge about, Levandowski, discussions with the Board and Benchmark partners concerning the Otto acquisition, Mr. Levandowski, and the relationship between the facts surrounding this case and his termination; negotiations with Mr. Levandowski regarding the founding of Ottomotto and Otto Trucking, and Otto
23		Melinda Haag	
24		Orrick	
25		405 Howard Street	
26		San Francisco, CA 94105-2669	
27		+1 415 773 5495	
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1		<a href="mailto:mhaag@orrick.com">mhaag@orrick.com</a>	acquisition; the Uber-Otto acquisition; solicitation of Google/Waymo employees; the Stroz due diligence analysis, investigation, and report; Uber's knowledge of stolen documents, understanding, and activity related to misappropriation of Google/Waymo trade secret and proprietary information; Levandowski's employment and continued employment at Uber; destruction of relevant evidence; and allegations made by Richard Jacobs, Uber's investigation into the Jacobs allegations and settlement with Jacobs.
9	Anthony Levandowski	May be reached through counsel:  Miles Erlich  Ramsey & Ehrlich LLP  803 Hearst Avenue  Berkeley, CA 94710 Tel: (510) 548-3600 <a href="mailto:miles@ramsey-ehrlich.com">miles@ramsey-ehrlich.com</a>	Mr. Levandowski will be asked to provide non-cumulative testimony regarding the development of Waymo's self-driving car technology, including its LIDAR designs and the development of Waymo's trade secrets, engineering practices of Waymo and the LIDAR team regarding the confidentiality of its designs and measures to keep them secret, his performance at Waymo, the contents of Waymo's SVN server, and communications with Google employees regarding Uber and formation of Otto; Uber's driverless car program; Uber's solicitation of Google and Waymo employees; the relationship between the facts surrounding this case and his termination; negotiations regarding the founding of Ottomotto and Otto Trucking, and Otto acquisition; the Uber-Otto acquisition; the Stroz due diligence analysis, investigation, and report; Uber's knowledge of stolen documents, understanding, and activity related to misappropriation of Google/Waymo trade secret and proprietary information; Levandowski's employment and continued employment at Uber; and destruction of relevant evidence. Waymo further identifies those subjects identified in Waymo's Statement Regarding Questions it Intends to Ask Anthony Levandowski at Trial. Dkt. 835.
26	John Krafcik	May be reached through counsel for Waymo	Mr. Krafcik will provide non-cumulative testimony regarding Waymo's business; Anthony Levandowski, and his departure from Google; the relationship between Waymo and Google; and Waymo's development of its TaaS service, and

1			valuations of Chauffeur.
2	Melanie Maugeri	May be reached through counsel for Stroz Friedberg	Ms. Maugeri will be asked to provide non-cumulative testimony regarding the Stroz due diligence analysis, investigation, and report.
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4	Brian McClendon	May be reached through counsel for Uber	Mr. McClendon will be asked to provide non-cumulative testimony regarding solicitation of and negotiations with Levandowski regarding founding Ottomotto and Otto Trucking; and the Uber-Otto acquisition, the development of Uber's self-driving technology, including before the Otto acquisition, Defendants' misappropriation of Waymo's trade secrets, including their acquisition, use and disclosure, and the lack of independent development.
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11	Angela Padilla	May be reached through counsel for Uber	Ms. Padilla will be asked to provide non- cumulative testimony regarding the Stroz due diligence analysis, investigation, and report; Levandowski's employment and continued employment at Uber; the relationship between the facts surrounding this case and his termination; and the Uber-Otto acquisition, Defendants' misappropriation of Waymo's trade secrets, including their acquisition, use and disclosure, and the lack of independent development; destruction of relevant evidence; and allegations made by Richard Jacobs, Uber's investigation into the Jacobs allegations and settlement with Jacobs.
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20	Gaetan Pennecot	May be reached through counsel for Uber	Mr. Pennecot will be asked to provide non-cumulative testimony regarding Defendants' misappropriation of Waymo's trade secrets, including their acquisition, use and disclosure, and the lack of independent development; the development of Waymo's self-driving car technology, including its LIDAR designs.
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24	Cameron Poetzcher	May be reached through counsel for Uber	Mr. Poetzcher will be asked to provide non-cumulative testimony regarding Uber's negotiations with Mr. Levandowski regarding the formation of Ottomotto/Otto Trucking; and the acquisition; solicitation of Google/Waymo employees; destruction of relevant evidence; and the Stroz due diligence analysis, investigation, and
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1			report.
2	Nina Qi	May be reached through counsel for Uber	Ms. Qi will be asked to provide non-cumulative testimony regarding Uber's decision to acquire Ottomotto (and to enter into an option to acquire Otto Trucking); contacts between Uber and Mr. Levandowski regarding the formation of Ottomotto / Otto Trucking, Uber's acquisition of those entities, and the benefits that Uber would obtain via those acquisitions; Uber's solicitation of Google/Waymo employees; Uber's internal views on those subjects, destruction of relevant evidence; and the Stroz due diligence analysis, investigation, and report.
10	Lior Ron	May be reached through counsel:  Taylor & Patchen, LLP One Ferry Building, Suite 355 San Francisco, CA 94111 T: (415) 788-8200	Mr. Ron will be asked to provide non-cumulative testimony regarding the misappropriation of Waymo trade secrets; founding of Ottomotto and Otto Trucking; the Uber-Otto acquisition; the Stroz due diligence analysis, investigation, and report; and the business and product development of Ottomotto and Otto Trucking, destruction of relevant evidence; Uber ATG's use of ephemeral communications and non-attributable devices and its relationship with Uber's Threat Operations division; and allegations made by Richard Jacobs, Uber's investigation into the Jacobs allegations and settlement with Jacobs. ..
19	Joe Spiegler	May be contacted through counsel:  Dave Resnicoff Erin Gasparka Riley Safer Holmes & Cancila LLP 70 W. Madison Street Suite 2900 Chicago, Illinois 60602 (312) 471-8700 <a href="mailto:dresnicoff@rshc-law.com">dresnicoff@rshc-law.com</a> <a href="mailto:egasparka@rshc-law.com">egasparka@rshc-law.com</a>	Mr. Spiegler will be asked to provide non-cumulative testimony regarding the Richard Jacobs letter and resignation email and allegations therein, investigation into Jacobs' allegations, and settlement with Jacobs; and Uber management's lack of deference to the legal department or legal advice.
26	Justin Suhr	May be reached through counsel for Uber	Mr. Suhr will be asked to provide non-cumulative testimony regarding the Stroz due diligence analysis, investigation, and report; and allegations made by Richard Jacobs, Uber's investigation into the Jacobs allegations and settlement with

1			Jacobs .
2	Eric Tate	May be reached through counsel for MoFo	Mr. Tate will be asked to provide non-cumulative testimony regarding the Uber-Otto acquisition; the Stroz due diligence analysis, investigation, and report; destruction of relevant evidence; Uber's counsel's awareness of the Jacobs resignation email and letter and allegations therein; and Uber's investigation into the Jacobs allegations and settlement with Jacobs. .
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8	Jim Timmins	May be reached through counsel for Waymo	Mr. Timmins will provide expert testimony regarding customary practices with respect to M&A transactions (including regarding indemnification) and the consideration paid by Uber to acquire Ottomotto (including relative to other acquisitions).
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12	Salle Yoo	May be reached through counsel for Uber	Ms. Yoo will be asked to provide non-cumulative testimony regarding the Uber-Otto acquisition; the Stroz due diligence analysis investigation, and report; continued employment and termination of Anthony Levandowski; and Defendants misappropriation of Waymo's trade secrets; destruction of relevant evidence; the Richard Jacobs letter and resignation email and allegations therein, investigation into Jacobs' allegations, and settlement with Jacobs; and Uber management's lack of deference to the legal department or legal advice.
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20	Sasha Zbrozek	May be reached through counsel for Waymo	Mr. Zbrozek will provide non-cumulative testimony concerning Google/Waymo's forensic investigation, particularly the SVN server and related log data, including Mr. Levandowski's download of the 14,000 files from the SVN server; Google/Waymo's reasonable efforts to maintain the secrecy of its electronic systems, digital document storage repositories , and computer networks
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**II. WITNESSES WAYMO MAY PRESENT AT TRIAL IF THE NEED ARISES**

Name	Contact Information	Substance of Testimony
Rey Allie	Unknown	Matters that concern the allegations made by Richard Jacobs, and Uber's reactions thereto, including the use of ephemeral communications, non-attributable devices, and improper privilege designations to avoid discovery, and Uber's competitive intelligence efforts and practices.
Chelsea Bailey	May be reached through counsel for Waymo	Ms. Bailey will provide non-cumulative testimony regarding the Chauffeur Bonus Plan; Mr. Levandowski's departure from Google, including Google's collection of Levandowski's laptops and delivery of those laptops to the Google forensics team; and Mr. Levandowski's performance as a Google/Waymo employee
Travis Bellanger	May be reached through counsel for Waymo	Mr. Bellanger will provide non-cumulative testimony concerning Google/Waymo's forensic investigation into the activities of Anthony Levandowski, including Google's collection of Levandowski's laptops and delivery of those laptops to the Google forensics team
Adam Bentley	May be reached through counsel for Uber	Mr. Bentley will be asked to provide non-cumulative testimony regarding the Uber-Otto acquisition; the Stroz due diligence analysis, investigation, and report; and destruction of relevant evidence.
Matthew Blattmachr	Bismuth Trust; May be reached through counsel:	Mr. Battmachr will be asked to provide non-cumulative testimony regarding the ownership of Levandowski's

1		Diane F. Vallentine	companies
2		Jermain, Dunnagan & Owens,	
3		PC	
4		3000 A Street, Suite 300	
5		Anchorage, AK 99503	
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7	Don Burnette	May be reached through	Mr. Burnette will be asked to
8		counsel for Uber	provide non-cumulative
9			testimony concerning
10			Defendants misappropriation
11			of Waymo's trade secrets,
12			including their acquisition, use
13			and disclosure, and the lack of
14			independent development; the
15			development of Waymo's self-
16			driving car technology,
17			including its LIDAR designs
18			and planner software; due
19			diligence by Stroz for Otto
20			acquisition by Uber; and
21			destruction of relevant
22			evidence.
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24	Neel Chatterjee	May be reached through	Mr. Chatterjee will be asked to
25		counsel for Otto Trucking	provide non-cumulative
26			testimony regarding Goodwin
27			Procter's possession of
28			misappropriated materials;
			destruction of relevant
			evidence; chain of custody of
			Anthony Levandowski's
			personal laptops, and searches
			thereof.
	Hanley Chew	May be reached through	Mr. Chew will be asked to
		counsel for Stroz Friedberg	provide non-cumulative
			testimony regarding the Stroz
			due diligence analysis,
			investigation, and report.
	Gerard Dwyer	May be reached through	Mr. Dwyer will provide non-
		counsel for Waymo	cumulative testimony
			regarding inputs to Waymo's
			current P&L. He may also
			provide testimony regarding
			Waymo's current business
			plan.
	Paul French	May be reached through	Rebuttal of expert testimony of
			Kevin Faulkner, including

1		counsel for Waymo	opinions related to the various
2			flaws and errors in Stroz's
3			search for Waymo confidential
4			information at Uber; rebuttal
5			of expert testimony of Erik
6			Laykin, including opinions
7			related to the Waymo forensic
8			investigation, Anthony
9			Levandowski's download of
10			the 14,000 files, Radu
11			Raduta's download of
12			confidential documents from
13			Google Drive and Sameer
14			Kshirsagar's download of
15			confidential documents from
16			Google Drive
17	Nick Gicinto	May be contacted through counsel:  Jennifer LaGrange Matthew Umhofer Spertus, Landes & Umhofer, LLP 1990 South Bundy Drive Suite 705 Los Angeles, CA 90025 310.826.4700 jennifer@spertuslaw.com matthew@spertuslaw.com	Mr. Gicinto will be asked to provide non-cumulative testimony regarding the allegations made by Richard Jacobs, including the use of ephemeral communications, non-attributable devices, and improper privilege designations to avoid discovery, and Uber's competitive intelligence efforts and practices; and Uber's investigation into the Jacobs allegations and settlement with Jacobs.
18	Arturo Gonzalez	MoFo; May be reached through counsel for Uber	Mr. Gonzalez will be asked to provide non-cumulative testimony regarding MoFo's possession of misappropriated materials; destruction of relevant evidence; and Defendants' knowledge of same; Uber's counsel's awareness of the Jacobs resignation email and letter and allegations therein; and Uber's investigation into the Jacobs allegations and settlement with Jacobs. As Waymo previously advised Uber, Waymo does not intend to call Mr. González as a witness unless Defendants open the door by claiming that they complied with their discovery obligations.
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1	Kristin Gunjonsson	May be reached through counsel for Waymo	Mr. Gudjonsson will provide non-cumulative testimony concerning Google/Waymo's forensic investigation into misappropriation of trade secrets, particularly analysis of hardware; Google/Waymo's reasonable efforts to maintain the secrecy of its electronic systems, digital document storage repositories, and computer networks, including but not limited to the SVN server
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9	Bruce Hartley	May be reached through counsel for Waymo	Rebuttal of expert testimony of Erik Laykin, including opinions related to security measures taken by Google/Waymo to protect their confidential and proprietary information, including but not limited to materials stored in Waymo's SVN repository
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14	Don Harrison	May be reached through counsel for Waymo	Mr. Harrison will provide non- cumulative testimony regarding Google's mergers and acquisitions, including the negotiation and drafting of Google's merger and acquisition agreements, the process of conducting valuations, and Waymo's valuations.
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20	Jennifer Haroon	May be reached through counsel for Waymo	Ms. Haroon will provide non- cumulative testimony regarding details of Waymo's first P&L, the negotiation of the valuation used in connection with the Chauffeur Business Plan, the timing of payments made under the Chauffeur Business Plan, and the 409(a) valuation conducted when Waymo was spun off from Google. Ms. Haroon may also provide testimony regarding the evolution of Waymo's business plan over time. Waymo further identifies the subjects of the Rule 30(b)(6) topic(s) for
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1			which she was designated as Waymo's corporate witness.
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3	Ben Ingram	May be reached through counsel for Waymo	Mr. Ingram will provide non-cumulative testimony regarding the development of Waymo's self-driving car technology, including its LIDAR designs and associated self-driving vehicle software development; the development of certain of Waymo's trade secrets.
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9	Scott Johnston	May be reached through counsel for Waymo.	Mr. Johnston will provide non-cumulative testimony regarding the use of Google Hangouts and related proprietary chat applications, including Google and Waymo's own use of and default settings for such applications.
10		Quinn Emanuel Urquhart & Sullivan, LLP	
11		50 California Street, 22nd Floor	
12		San Francisco, California 94111	
13		415-875-660	
14	Rudy Kim	MoFo	Mr. Kim will be asked to provide non-cumulative testimony regarding the Uber-Otto acquisition; the Stroz due diligence analysis, investigation, and report; and destruction of relevant evidence.
15		May be reached through counsel for Uber	
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19	Asheem Linaval	May be reached through counsel for Uber	Mr. Linaval will be asked to provide non-cumulative testimony concerning Defendants misappropriation of Waymo's trade secrets, including their acquisition, use and disclosure, and the lack of independent development; the development of Waymo's self-driving car technology, including its LIDAR designs.
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25	David Lawee	May be reached through counsel for Waymo	Mr. Lawee will provide non-cumulative testimony regarding Google's mergers and acquisitions, including the negotiation and drafting of Google's merger and acquisition agreements, the process of conducting
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1			valuations, Waymo's
2			valuations, and the Chauffeur
3			Bonus Plan. Waymo further
4			identifies the subjects of the
5	Max Levandowski	May be reached through	Rule 30(b)(6) topic(s) for
6		counsel for Uber	which he was designated as
7			Waymo's corporate witness.
8			
9			Mr. Levandowski will be
10			asked to provide non-
11			cumulative testimony
12	Rhian Morgan	May be reached through	concerning Defendants
13		counsel for Uber	misappropriation of Waymo's
14			trade secrets, including their
15			acquisition, use and disclosure,
16			and the lack of independent
17			development; the development
18			of Waymo's self-driving car
19			technology, including its
20			LIDAR designs.
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22			Ms. Morgan will be asked to
23			provide non-cumulative
24			testimony regarding the
25			founding and business of
26	Jake Nocon	May be contacted through	Ottomotto and Otto Trucking;
27		counsel:	Uber's acquisition of Otto; and
28		Jennifer LaGrange	the Stroz due diligence
		Matthew Umhofer	analysis, investigation, report;
		Spertus, Landes & Umhofer,	Defendants misappropriation
		LLP	of Waymo's trade secrets,
		1990 South Bundy Drive	destruction of relevant
		Suite 705	evidence.
		Los Angeles, CA 90025	
		310.826.4700	
		jennifer@spertuslaw.com	
		matthew@spertuslaw.com	
			Mr. Nocon will be asked to
			provide non-cumulative
			testimony regarding the
			allegations made by Richard
			Jacobs, including the use of
			ephemeral communications,
			non-attributable devices, and
			improper privilege
			designations to avoid
			discovery, and Uber's
			competitive intelligence efforts
			and practices; and Uber's
			investigation into the Jacobs
			allegations and settlement with
			Jacobs.
26	Daniel Ratner	May be reached through	Mr. Ratner will be asked to
27		counsel for Uber	provide non-cumulative
28			testimony concerning
			Defendants misappropriation
			of Waymo's trade secrets.

1			including their acquisition, use and disclosure, and the lack of independent development; the development of Waymo's self-driving car technology, including its LIDAR designs.
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5	Ed Russo	May be contacted through counsel:	Mr. Russo will be asked to provide non-cumulative testimony concerning the allegations made by Richard Jacobs, including the use of ephemeral communications, non-attributable devices, and improper privilege designations to avoid discovery, and Uber's competitive intelligence efforts and practices; and Uber's investigation into the Jacobs allegations and settlement with Jacobs.
6		Jennifer LaGrange	
7		Matthew Umhofer	
8		Spertus, Landes & Umhofer, LLP	
9		1990 South Bundy Drive	
10		Suite 705	
11		Los Angeles, CA 90025	
12		310.826.4700	
13		<a href="mailto:jennifer@spertuslaw.com">jennifer@spertuslaw.com</a>	
14		<a href="mailto:matthew@spertuslaw.com">matthew@spertuslaw.com</a>	
15			
16	Bryan Salesky	May be contacted through counsel:	Mr. Salesky will provide non-cumulative testimony regarding the history of Google/Waymo's self-driving-car development efforts; Mr. Levandowski's performance as a Google/Waymo employee; certain of Mr. Levandowski's communications with Uber prior to his departure from Google/Waymo
17		Stacy North	
18		Pierce & Shearer LLP	
19		<a href="mailto:snorth@pierceshearer.com">snorth@pierceshearer.com</a>	
20		650-843-1900	
21	Ognen Stojanovski	May be reached through counsel for Uber	Mr. Stojanovski will be asked to provide non-cumulative testimony regarding Defendants misappropriation of Waymo's trade secrets, including their acquisition, use and disclosure, and the lack of independent development; regarding Tyto LiDAR and Otto's acquisition of Tyto; regarding communications with Mr. Levandowski regarding Tyto LIDAR and other businesses related to Mr. Levandowski.
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27	Joe Sullivan	May be contacted through counsel:	Mr. Sullivan will be asked to provide non-cumulative testimony regarding the
28			

1		Alan B. Exelrod RUDY EXELROD ZIEFF & LOWE LLP 351 California Street Suite 700 San Francisco, CA 94104 415.434.9800 abe@rezlaw.com	allegations made by Richard Jacobs, including the use of ephemeral communications, non-attributable devices, and improper privilege designations to avoid discovery, and Uber's competitive intelligence efforts and practices; and Uber's investigation into the Jacobs allegations and settlement with Jacobs.
8	Chris Urmson	May be reached through counsel:  Benjamin L. Singer  601 Montgomery St. Suite 1950 San Francisco, CA 94111  <u>415-500-6080</u>	Mr. Urmson will provide non- cumulative testimony regarding the history and development of Waymo's self- driving car technology, including its LIDAR designs; Mr. Levandowski's performance at Google and circumstances surrounding his termination from Google; Chauffeur Bonus Plan; Waymo valuation(s).
14	Tim Willis	May be reached through counsel for Waymo	Mr. Willis will provide non- cumulative testimony regarding Waymo's supply chain operation, including reasonable steps taken to protect confidential and proprietary information shared with suppliers.

### III. WITNESSES WHO MAY TESTIFY BY DEPOSITION

The following witnesses may testify by deposition:

Anthony Levandowski

Travis Kalanick

Nina Qi

Bill Gurley

Jeff Holden

John Bares

Gaetan Pennecot

1	Dan Gruver
2	James Haslim
3	Cameron Poetzcher
4	Scott Boehmke
5	Lior Ron
6	Adam Bentley
7	Rhian Morgan
8	Don Burnette
9	Ognen Stojanovski
10	Salle Yoo
11	Asheem Linaval
12	Angela Padilla
13	Justin Suhr
14	Eric Tate
15	Rudy Kim
16	John Gardner
17	Chris Urmson
18	Brian McClendon
19	Bryan Salesky
20	Eric Friedberg
21	Hanley Chew
22	Mary Fulginiti
23	Melanie Maugeri
24	Richard Jacobs
25	Joe Sullivan
26	Joe Spiegler
27	Mat Henley
28	Ed Russo

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Craig Clark  
Nick Gicinto  
Jake Nocon

DATED: January 19, 2018

QUINN EMANUEL URQUHART & SULLIVAN,  
LLP

By /s/ Charles K. Verhoeven  
Charles K. Verhoeven  
Attorneys for WAYMO LLC